IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

PAMELA K. HARTNETT,)	
Plaintiff,)))	
v.)	
) Civil Action No.: 3:23-cv-	17
CHARLES VANEVERA)	
HARDENBERGH, et al.,)	
)	
Defendants.)	

DECLARATION OF PAMELA K. HARTNETT

- I, PAMELA K. HARTNETT, hereby declare under penalty of perjury that:
- 1. I am over eighteen years of age and fully competent to make this declaration. I have personal knowledge of all the statements made herein and this Declaration is provided, in addition to and in support of the Affidavit I signed and dated on or about January 2, 2023, that I was a North Carolina resident, and which was filed herein pursuant to Local Rule 7 (ECF Doc. 4).
- 2. I am domiciled in and a resident of the State of North Carolina and have been continuously since June 9, 2022, having moved from Petersburg, Virginia, due in part to the fear of Defendants in this matter and their campaign of defamation and the bringing of false criminal complaints against me as more fully set out in the First Amended Complaint.
- 3. The exhibits attached to my Response to Defendants' Rule 12(b)(1) Motion to Dismiss are true and accurate and represent evidence of my domicile in North Carolina, including, but not limited to:
 - a. Lease agreement;
 - b. Application for utilities for my North Carolina residence;

- c. North Carolina driver's license;
- d. Car insurance coverage in North Carolina;
- e. North Carolina automobile title and registration;
- f. Dermatology appointments in North Carolina.
- 4. My personal property is located in North Carolina, including my car and my furnishings for my home.
 - 5. My bank (Truist Bank) is located in Littleton, North Carolina.
 - 6. I attend a Catholic Church in Littleton, North Carolina.
 - 7. I am not employed.
- 8. I plan on paying taxes as otherwise required in both Virginia and North Carolina for the year 2022.
- 9. I have read the affidavit of Defendant Charles Hardenbergh ("Mr. Hardenbergh") (ECF Doc 25-6), and it is false in that I am in fact domiciled in North Carolina, and I do not maintain a residence in Petersburg, Virginia, as I gave my former residence and property to my adult nephew by a recorded deed of gift.
- 10. Prior to and following my move to North Carolina, I have been continuously treated by health care providers located in Richmond, Virginia, including a recent hip replacement in which I was in a wheelchair while attending the final criminal proceeding held in Petersburg General District Court on January 27, 2023.
- 11. I have been in Petersburg General District Court due to the criminal actions filed by Defendant Mr. Hardenbergh and the protective order sought by Defendants, Mr. Hardenbergh, Mari Hardenbergh, and Israel De La Cruz, which required an estimated eight personal appearances from May 2022 to January 27, 2023, in addition to visits with my attorneys and meetings with

members of the Petersburg Police Department in connection with the criminal charges, including the seven unserved trespass charges. Having not seen Mr. Hardenbergh's claimed video of my car, nonetheless I drove or was driven in my car to Petersburg General District Court which is about a block away from Defendant's current home and office located on Monroe Street, Petersburg, Virginia.

- 12. My sister lives in Petersburg, Virginia, and I have visited her and other friends in Petersburg since my move to North Carolina.
- 13. Mari Hardenbergh and Israel De La Cruz were physically present at each court hearing regarding the petition for a protective order against me.

I declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the foregoing statements are true and correct to the best of my knowledge and belief.

Executed on this 12th day of April, 2023.

Respectfully submitted,